

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER REDFORD
COMMISSIONER SMITH
COMMISSION SECRETARY
LEGAL
WORKING FILE**

FROM: MATT ELAM

DATE: SEPTEMBER 25, 2013

SUBJECT: COMPLIANCE FILING – REVISED TARIFF SCHEDULES 72 AND 84

On August 30, 2013, Idaho Power filed compliance tariffs in accordance with Order Nos. 32846 and 32872 in Case No. IPC-E-12-27, Idaho Power's recent net metering case. In Order No. 32846, regarding the interconnection issues addressed in Schedule No. 72, the Commission stated: "the proposed resolution, as reflected in Exhibit 8, is fair, just, and reasonable, and we approve it. The Company shall work with Staff, ICEA, and other interested parties to finalize the details of Exhibit 8, and the Company shall file conforming tariff language for our approval before the proposed, October 1, 2013 effective date."

The Company also filed revisions to Schedule 84, its net metering tariff, as directed by Order No. 32486. Idaho Power did not include tariff modifications associated with the item under reconsideration in Order No. 32872, namely, the language addressing the issue of applying net metering credits to offset usage at multiple meters. The Company will file conforming tariffs once the Commission has reconsidered the issue and a final ruling has been made.

In addition, the Company has also added "geothermal" to Schedule 84 as an eligible resource for interconnection. The Commission did not explicitly approve "geothermal" as an eligible resource in Order No. 32846, but the Company has interpreted the absence of mention as implicit approval.

STAFF REVIEW

Staff reviewed Schedule No. 72 to determine whether it comports with Commission Order Nos. 32846 and 32872. Specifically, Staff looked closely at Idaho Power's Exhibit 8. The exhibit contains a document distributed by the Company to the Staff and Idaho Clean Energy

Association (ICEA) on May 8, 2013. It describes issues that Staff and ICEA have with the Company's proposed interconnection provisions, and details specific resolutions that were reached. The parties finalized most of the issues by the deadline for rebuttal testimony, but needed to resolve the specific details for a few issues even though a resolution was reached in principle.

The Company has worked with Staff, ICEA, and other interested parties to finalize the details of Exhibit 8. Staff confirmed with the parties that a compromise on the issues outlined in Exhibit 8 had been reached. There were a couple of modifications proposed by the ICEA prior to the Company's compliance filing that were not addressed in Exhibit 8, consequently, Staff confirmed that the Company did not make additional modifications to its tariffs due to proposals by ICEA that extend beyond the issues addressed in Exhibit 8. Staff believes the Company's proposal is reasonable and complies with Commission Order Nos. 32846 and 32872; therefore, Staff proposes the Commission approve the tariff changes to Schedule 72.

Staff reviewed Schedule 84 and identified a couple of minor issues the Company agreed to fix. Consequently, the Company filed replacement sheets on September 20, 2013. Order No. 32486 does not mention the addition of geothermal, but Staff believes its omission was simply an oversight and that it should be included as an eligible resource. Staff has reviewed the tariff filed on August 30, 2013 and the replacement sheets, and believes Schedule 84 complies with Commission Order Nos. 32846 and 32872. Staff proposes the Commission approve the tariff changes to Schedule 84.

STAFF RECOMMENDATION

Staff recommends that Idaho Power's compliance filing to change Schedule Nos. 72 and 84 be approved and the associated tariff sheet revisions be allowed to go into effect on October 1, 2013. Staff proposes that the Company promptly file a conforming Schedule 84 tariff once a final ruling has been made on the item being reconsidered by the Commission.

COMMISSION DECISION

Does the Commission wish to approve the tariff changes to Schedule Nos. 72 and 84?


Matt Elam

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